

# Katers & Granitz, LLC

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8112 West Bluemound Road, Suite 101, Milwaukee, WI 53213 | T: 414.533.0211 | F: 414.600.9551  
kraasch@katersgranitz.com | [www.katersgranitz.com](http://www.katersgranitz.com)

February 22, 2024

**VIA ECF**

The Honorable Lynn Adelman  
United States District Court for the  
Eastern District of Wisconsin  
517 East Wisconsin Avenue  
Milwaukee, WI 53202

Re: Estate of the Unborn Child of Jennifer Jawson, et al v. Armor, et al.;  
Case No.: 19-CV-1008-LA

Dear Judge Adelman:

On Tuesday, February 20, 2024, Defendant Horton's counsel provided Plaintiffs with their proposed read ins in for Dr. John May's deposition. The Plaintiffs objected to several lines of said testimony. The parties were able to resolve several issues in cooperation, however, there remains limited objections that require the Court's intervention so that edits can be made to Dr. May's video deposition to be presented at trial in one segment under the Rule of Completeness. To that end, we have identified below the areas in dispute:

- P. 20, L. 17-20. Plaintiffs object to this testimony as it lacks foundation and calls for their speculation;
- P.91, L.2-14, Plaintiffs object to this testimony as it is non-responsive, lacks foundation, and calls for speculation;
- P.101, L.1-11, Plaintiffs object to this testimony as inadmissible character testimony, specifically the phrase, "has practiced good judgment...";
- P.106, L.7-17, Plaintiffs object to this testimony as non-responsive;
- P.109, L.8-19, Plaintiffs object to this testimony as inadmissible hearsay;
- P.111, L.21-25, Plaintiffs object to this testimony as it lacks foundation and calls for speculation, "it appears...";
- P.121, L.10-19, Plaintiffs object to this testimony as it lacks foundation and calls for speculation.

We have also attached the testimony highlighted in yellow. Thank you.

Sincerely,

S/ Kevin G. Raasch  
Kevin G. Raasch  
Attorney & Counselor at Law

Katers & Granitz, LLC  
8112 W. Bluemound. Suite 101  
Milwaukee, WI 53213  
Ph: (414) 616-7042, Fax: (414) 600-9551  
Attorneys for Plaintiffs